Applicant: David H. Levy et al. Attorney s Docket No.: 13159-004001

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REMARKS

All previously withdrawn claims, along with rejected claims 15, 26, 53 and 62-66, have been cancelled in order to place the application in condition for immediate allowance, considering the following remarks. Claims 1-14, 58-61 and new claim 67 remain pending for continued examination, all depending from claim 1. Applicants reserve the right to present the cancelled claims in one or more continuing applications.

Claims 1-5, 7-14 and 58-61 have been rejected under 35 U.S.C. §103(a) as being obvious over Lapeyre (U.S. 4,994,992) in view of Furuhata et al. (U.S. 5,943,043, "Furuhata"). Applicants respectfully traverse this rejection.

The aspect of the invention recited in claim 1 is directed to a method of providing input feedback in a device having a keyboard with a matrix of interstitial key regions and raised independent key regions, such as a keypad with keys of different heights, as shown in Lapeyre. However, the method of claim 1 is particularly directed to interpreting input when multiple, adjacent key regions are activated, such as by the same finger. Such issues become more prevalent when key spacing is reduced to less than the width of a human finger, as Applicants discuss in their specification.

Furuhata provides no insight into helping to resolve overlapping activation of adjacent keys or key regions of the type of keypad shown in Lapeyre. Instead, Furuhata provides a "double-touch" method of touch screen input specifically meant as a substitute for a "doubleclick" input of a mouse or trackball (see the first three lines of the Abstract of Furuhata, for example). In other words, Furuhata's method purports to enable a user to touch one region (an icon, for example) of a touch screen and then, by lightly tapping a second, distant region of the screen with another finger while holding the first finger on the icon, select the icon as would a double-click entry. Furuhata's algorithm specifically teaches checking to make sure that the position of the second touch is far enough from the first touch to significantly alter the output of the touch screen (see step 50 in his Fig. 4, and related text), in order to distinguish between a second, distant touch by a different finger, and a displacement of the first finger. Furthermore, Furuhata's detection of the "double-touch" activation of a remote region of the touch screen

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provisional output, as claimed.

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results only in the selection of the provisional output, not in a final output to the exclusion of the

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The Examiner postulates that one of ordinary skill would have been motivated to revise Lapeyre's keypad to use Furuhata's "activation means" in order to output more data with the same number of key regions. However, even if such motivation were found to exist, it would not result in Applicants' claimed invention, nor is Applicants' invention directed to such benefit. There are other keyboards known in the art that employ combinations of keys for an input (e.g., the CTL-ALT-DEL combination well-known among PC users), but such combinations, like Furuhata's combination of touch screen regions, are generally composed of spaced-apart regions or keys, such that the combination is not inadvertently entered by a mis-directed finger.

The invention recited in Applicant's claim 1, on the other hand, particularly enables interpretation of the overlapping activation of multiple key regions, such as with the same finger. Specifically, claim 1 recites, in the context of a matrix of interstitial key regions and raised independent key regions, providing a final output in response to activation of an adjacent key region prior to release of the first activated key region.

Furthermore, Applicants note that nothing in the proposed combination of Lapeyre and Furuhata supplies the feature of first providing provisional output to a user indicating that the activated key region has been registered; and then, in response to activation of an adjacent key region prior to release of the first activated key region, providing a final output to the user to the exclusion of the provisional output.

Applicants respectfully submit that the invention of claim 1 represents a significant advance in the field of keypads with interstitial and raised key regions, an advance that is neither suggested nor motivated by Furuhata's "double-touch" touch screen method.

Claim 6 has been rejected under 35 U.S.C. §103(a) as being obvious over the combination of Lapeyre and Furuhata, discussed above, further in view of Ahmadian (U.S. 5,914,677). As Ahmadian does not cure the deficiency of the base combination of references, as applied to claim 1 above, Applicants submit that claim 6 is allowable at least as depending from an allowable claim.

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Claims 15, 26, 53 and 62-66 have also been rejected under 35 U.S.C. §103(a) as being obvious over Lapeyre (U.S. 4,994,992) in view of Furuhata et al. (U.S. 5,943,043, "Furuhata"). While Applicants note for the record that the Examiner's detailed comments appear to indicate that the rejection was intended to include at least the Ahmadian reference, Applicants submit that the cancellation of these claims renders the rejection moot.

New claim 67 simply presents that, within the context of claim 1, the first activated and adjacent key regions may comprise two raised key regions on either side of an interstitial key region. Such a characteristic is fully supported by the specification, and distinguishes other arrangements within claim 1, such as where the first activated and adjacent key regions include a raised key region and an adjacent, interstitial key region, for example.

Applicants respectfully submit that all claims are now in condition for allowance, which action is requested.

Enclosed is a \$55 check for the Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

James W

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